

United States District Court  
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

MARLON TERRELL COLLINS

## CRIMINAL COMPLAINT

Case Number:

10-MJ-491 FLN

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 2010 to September 3, 2010, in Hennepin County, in the State and District of Minnesota, defendant(s)

knowingly and intentionally conspired with others to distribute five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, and approximately 8.13 kilograms of a mixture or substance containing a detectable amount of marijuana.

in violation of Title 21, United States Code, Section(s) 841(a)(1) and 841(b)(1)(B).

I further state that I am a Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

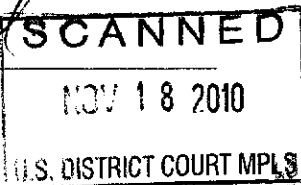
Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

11/17/10 3:25 pm  
Date  
The Honorable Franklin L. Noel  
UNITED STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

at

Signature of Complainant  
Sean E. Harris  
DEA  
Minneapolis, MN  
City and State  
Signature of Judicial Officer  
Franklin L. Noel



STATE OF MINNESOTA     )  
  )  
COUNTY OF HENNEPIN    )

ss. AFFIDAVIT OF SA SEAN E. HARRIS

1. I am a Special Agent (SA) of the Drug Enforcement Administration (“DEA”) and have been so employed since 2008. In this capacity, I am responsible for the enforcement of the laws of the United States of America, including laws relating to drug enforcement, drug trafficking, and related crimes. During my law enforcement career I have conducted numerous investigations into the unlawful possession of controlled substances, narcotics trafficking, crimes of violence against persons, and associated conspiracies.

2. This Affidavit is submitted in support of a Complaint against Marlon Terrell Collins (“Collins”) charging him with conspiracy to distribute cocaine and marijuana, in violation of 21 United States Code 841(a)(1) and 841(b)(1)(B) .

3. Collins is on federal supervised release status for a 1998 conviction in the United States District Court, District of Minnesota. That conviction was for aiding and abetting possession with intent to distribute in excess of fifty (50) grams of crack cocaine (Case No. CR 98-14-01 RHK). Collins was also convicted in 1993 in the United States District Court, District of Minnesota, of possession with intent to distribute cocaine (Count 1) and carrying a firearm in relation to a drug trafficking crime (Count 2) (Case No. CR 3-92-138 (1)).

4. In September 2010, law enforcement officers developed information that Collins was involved in procuring illegal narcotics from Phoenix, Arizona. Law enforcement also learned Collins had traveled from Minnesota to Arizona to obtain illegal narcotics to ship back to Minnesota.

5. On September 2, 2010, law enforcement officers conducted surveillance of a FedEx shipping store in Phoenix Arizona. During surveillance, law enforcement observed Collins exit a vehicle carrying a large brown box. Collins was observed and photographed walking directly into the FedEx shipping store. While in the FedEx facility, Collins made arrangements to deliver the box to an address in Brooklyn Park, Minnesota. Law enforcement recorded Collins’s activities inside and outside the FedEx location.

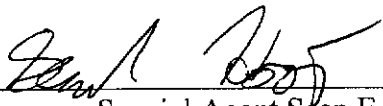
7. On September 3, 2010, law enforcement obtained a search warrant to search the box Collins brought to the FedEx store and the contents therein. The box was searched. Four separate packages of controlled substances were discovered, including one (1) package of a mixture or substance containing a detectable amount of cocaine weighing approximately 1.48 kilograms, and three (3) packages of a mixture or substance containing a detectable amount of marijuana weighing approximately 8.13 kilograms.

8. On September 3, 2010, law enforcement officers met Collins at the Minneapolis/St. Paul International Airport when Collins arrived from his flight from Phoenix, Arizona. Collins provided a voluntary and non-custodial statement in an open passenger waiting area at the airport. Collins admitted that he was recently in Phoenix, Arizona. Collins admitted to sending the above-described box via FedEx with the intent that it be delivered to an address in the State and District of

Minnesota. Collins admitted that the box contained the above-described controlled substances. Collins shared that he had colluded with other individuals to obtain and distribute the above-described controlled substances. The drugs were to be distributed in the state and District of Minnesota. Defendant also admitted that the planned proceeds from the sale of the above-described controlled substances would be held in Minnesota until they could be provided to one of his co-conspirators from Arizona. According to Collins, the co-conspirator was en route to Minnesota from Chicago, Illinois, with additional controlled substances.

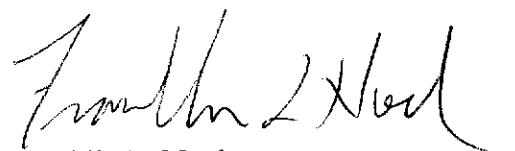
9. Collins admitted to multiple previous and similar transactions involving this particular drug source in Arizona, wherein controlled substances were delivered to the State and District of Minnesota. Collins shared he had delivered via U.S. Mail drug proceeds from Minnesota to his co-conspirators in Arizona. Collins also provided that his agreement with this particular drug source began on or around June 2010.

10. Regarding the box Collins delivered on September 2, 2010, Collins provided that he knew no one at the intended address in Brooklyn Center, Minnesota. He intended for either himself or someone at his direction to watch the address until the parcel arrived, and that he had used this same address and process on previous occasions.

  
Special Agent Sean E. Harris  
Drug Enforcement Administration

SUBSCRIBED and SWORN to Before Me

This 17<sup>th</sup> day of November 2010



Franklin L. Noel  
United States Magistrate Judge